

Modified Appendix A

APPENDIX A
Modified - Documents in Dispute

Document	ECF No.¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions²	Defendants' Reply
Category A - Redactions to Third Party Investor Names and Personal Information					
Exhibits A-G to PX 1	171-10	A, B	These documents have not been filed on the public docket. Defendants request these documents be filed under seal and placed on the public docket in redacted form.	Dkt. 171-10 Object; As set forth in more detail in SEC's response to Investor A's motion to redact certain information in these documents, SEC agrees to redaction of investor identifying information only; see Investor Chart under Investor A	Category A: The SEC agrees to the redaction of the purchaser's identifying information. Category B: As detailed in the letter, Exhibits B and D to PX 1 also fall into Category B because they contain redactions to confidential business information. Defendants are refiling this document with the proposed redactions.
Exhibits A-E to PX 4	171-13	A	These documents have not been filed on the public docket. Defendants request these documents be filed under seal and placed on the public docket in redacted form.	Dkt. 171-13 SEC agrees with Telegram's proposed redactions to Exhibits B, D and E to PX4; Telegram under-redacted personal identifying information in Exhibits A and C	Defendants disagree with the SEC's proposed redactions and refer the Court to the filed exhibit at ECF No. 171-13.

¹ Bolded text indicates the ECF number associated with the document filed in connection with Defendants' Sealing Motion.

² "Agree" means that the SEC agrees with the redactions Defendants have proposed in the referenced docket entry. (See Exhibit A to the Opposition (ECF No. 189-1).)

Document	ECF No.¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions²	Defendants' Reply
PX 15*	81-15 171-7	A	Defendants request this document be filed under seal and placed on the public docket in redacted form. Defendants defer to the requests of the third parties filed in connection with this document to determine appropriate redactions.	Dkt. 171-7 Agree except Telegram under-redacted personal identifying information	Defendants are refileing this document with revised redactions to address the SEC's position.
PX 25*	81-25 169-21	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	169-21 appears to be a filing error as it is not PX25	Defendants are refileing PX25 with proposed redactions.
PX 34*	81-29 169-24	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-24 Agree except Telegram under-redacted personal identifying information	Defendants are refileing this document with revised redactions to address the SEC's position.
PX 50	N/A	A	This documents has not been filed on the public docket. Defendants request this documents be filed under seal and placed on the public docket in redacted form.	Telegram proposed redactions not located	Defendants withdraw their request for sealing and redaction.

Document	ECF No. ¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions ²	Defendants' Reply
PX 58*	81-49 169-28	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-28 Agree except Telegram under-redacted personal identifying information	Defendants are refiling this document with revised redactions to address the SEC's position.
PX 59	N/A	A	This documents has not been filed on the public docket. Defendants request this documents be filed under seal and placed on the public docket in redacted form.	Telegram proposed redactions not located	Defendants withdraw their request for sealing and redaction.
PX 97*	81-79 169-40	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-40 Object to proposed redactions of investor identifying information; Investor engaged in marketing and sales of Grams	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 169-40.
PX 98*	81-80 169-41	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-41 Object to proposed redactions of investor identifying information; Investor engaged in marketing and sales of Grams	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 169-41.

Document	ECF No. ¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions ²	Defendants' Reply
PX 117	171-26	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	Dkt. 171-26 Agree except Telegram under-redacted personal identifying information	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 171-26.
PX 126	81-98 102-2	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Telegram proposed redactions not located See SEC's proposed redactions in corresponding docket entry	Defendants refer the Court to the refiled document at ECF No. 102-2.
Exhibit N to the McGrath Declaration	83-14 166-5	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 166-5 Agree except Telegram under-redacted personal identifying information	Defendants are refiling this document with revised redactions to address the SEC's position.
Exhibit 2 to the Drylewski Declaration	73-2 165-1	A, B	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 165-1 Object to all proposed redactions except at 287-line 3 on ground not investor identification information and not otherwise proprietary or confidential information	Category A: The SEC agrees to the redaction of the purchaser's identifying information. Category B: As detailed in the letter, this document also falls into Category B because it includes confidential business information. Defendants are refiling this document with revised redactions.

Document	ECF No. ¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions ²	Defendants' Reply
Exhibit 4 to the Drylewski Declaration	73-4 165-2	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 165-2 Responses to SEC's First Interrogatories Object to the proposed redactions beyond personal identifying information of investors and prospective investors	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 165-2.
Exhibit 5 to the Drylewski Declaration	73-5 165-3	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 165-3 Object to the proposed redactions of names of individuals and entities involved in marketing and selling Gram interests	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 165-3.
Exhibit 10 to the Drylewski Declaration	73-10 165-5	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 165-5 Object to the proposed redactions of names of individuals and entities involved in marketing and selling Gram interests	Defendants disagree with the SEC's proposed redactions. Defendants are refileing this document with revised redactions.

Document	ECF No. ¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions ²	Defendants' Reply
Exhibit 1 to the McKeon Declaration in Support of Defendants' Motion for Summary Judgment and in Opposition to Plaintiff's Application for a Preliminary Injunction	74-1 102-1	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Telegram's proposed redactions not located	Defendants refer the Court to the filed exhibit at ECF No. 102-1.
Exhibit 1 to the Malloy Declaration	94-1 167-1	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-1 Excerpts from Pavel Durov Deposition Object to redactions of names of investors and entities that were involved in marketing and reselling Gram interests; their identities and roles are highly relevant to judicial determination whether Telegram qualifies for an exemption from registration; Agree to redaction of name of investor at p. 185, line 16-17	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 167-1.

Document	ECF No. ¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions ²	Defendants' Reply
Exhibit 2 to the Malloy Declaration	94-2 167-2	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-2 Excerpts from Ilya Perekopsky Deposition Object to redactions of names of investors and entities that were involved in marketing and reselling Gram interests; their identities and roles are highly relevant to judicial determination whether Telegram qualifies for an exemption from registration; Object to redactions of names of vendors contacted re use of Grams; Telegram's efforts and efforts of others to develop the TON blockchain are highly relevant to issues before the Court	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 167-2.
Exhibit 3 to the Malloy Declaration	94-3 167-3	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-3 Excerpts from Shyam Parekh Deposition Object ; proposed redactions relate to individuals and entities that were involved in marketing and reselling Gram interests; their identities and roles are highly relevant to judicial determination whether Telegram qualifies for an exemption from registration;	Defendants disagree with the SEC's proposed redactions. Defendants are refiling this document with revised redactions.

Document	ECF No. ¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions ²	Defendants' Reply
Exhibit 5 to the Malloy Declaration	94-5 170-4; 171-4	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Telegram's proposed redactions not located	Defendants refer the Court to the documents filed at ECF Nos. 170-4 and 171-4.
Exhibit 8 to the Malloy Declaration	94-8 167-7	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-7 Email chain Object to redacting name of non-investor entity who was involved in marketing and reselling Gram interests	Defendants are refiling this document without redactions.
Exhibit 9 to the Malloy Declaration	94-9 167-8	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-8 Object to redaction of entity's name. Telegram letter to purchaser re information it was reselling Gram interests; entity was not a passive purchaser and its actions are relevant to issues before the Court re <i>Howey</i> test and claimed exemptions from registration	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 167-8.

Document	ECF No. ¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions ²	Defendants' Reply
Exhibit 10 to the Malloy Declaration	94-10 167-9	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-8 Object to redaction of entity's name. Telegram letter to purchaser re information it was reselling Gram interests; entity was not a passive purchaser and its actions are relevant to issues before the Court re <i>Howey</i> test and claimed exemptions from registration	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 167-9.
Exhibit 11 to the Malloy Declaration	94-11 167-10	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-10 Telegram invoice paying entity for services in marketing and selling grams to additional investors. Object to redaction of entity's name; entity was not a passive purchaser and its actions are relevant to issues before the Court re <i>Howey</i> test and claimed exemptions from registration; Agree to proposed redactions of names of investors that entity assisted Telegram in enlisting	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 167-10. Defendants agree that the names of purchasers that this "entity assisted Telegram in enlisting" should be redacted.

Document	ECF No. ¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions ²	Defendants' Reply
Exhibit 14 to the Malloy Declaration	94-14 167-11	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-11 Agreement between Telegram and entity to "broker the sale of a new cryptocurrency called "Grams" to potential investors identified by Company;" Object to redaction of entity's name; entity not a passive investor; entity's role in assisting Telegram in its offer and sale of Grams are relevant to issues before the Court re <i>Howey</i> test and claimed exemptions from registration;	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 167-11.
Exhibit 15 to the Malloy Declaration	94-15 167-12	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-12 Telegram email chain with its auditor and an investor; Object to redacting name of auditor, no basis for redaction; Agree to redact name of investor.	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 167-12.

Document	ECF No. ¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions ²	Defendants' Reply
Exhibit 1 to the Musoff Declaration	121-1 168-1	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 168-1 Excerpts from Pavel Durov Deposition Object to redaction of each of the referenced entity's names; entities not passive investors; the entities roles in assisting Telegram in its offer and sale of Grams are relevant to issues before the Court re <i>Howey</i> test and claimed exemptions from registration;	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 168-1.
Exhibit 5 to the Musoff Declaration	121-5 168-4	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 168-4 Email from investor entity to Telegram re payment for services rendered to Telegram in obtaining new investors in Offering; entity not a passive investor; entity's role in assisting Telegram in its offer and sale of Grams are relevant to issues before the Court re <i>Howey</i> test and claimed exemptions from registration;	Defendants disagree with the SEC's proposed redactions and refer the Court to Defendants' filing at 168-4. Defendants agree with Plaintiff's position in its response to Exhibit 11 to the Malloy Declaration, above, that "proposed redactions of names of investors that entity assisted Telegram in enlisting" are proper and disagree with the contrary position taken here.

Document	ECF No. ¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions ²	Defendants' Reply
Category B - Highly Confidential Business and Proprietary Information					
PX 55	171-14	B	This document has not been filed on the public docket. Defendants request this document be filed under seal and filed on the public docket in redacted form.	Dkt. 171-14; email chain between Telegram employee and binance employee; Object to proposed redaction; Telegram seeks to redact suggestion from third party re potential future business idea on ground release of future business plans could hurt business, but Telegram's future business plans are directly relevant to key issues to be decided by Court including whether Telegram will continue to engage in efforts to support and develop the TON Blockchain and this business idea is not likely to harm Telegram's competitive standing	As detailed in the letter, PX 55 discusses a potential promotion and future partnership, which is confidential information about Defendants future business plans and strategy. Defendants reiterate the request that this document be filed under seal and filed on the public docket in redacted form.

Document	ECF No. ¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions ²	Defendants' Reply
PX 123	171-27	B	This document has not been filed on the public docket. Defendants request this document be filed under seal and filed on the public docket in redacted form.	Dkt. 171-27; email chain between Telegram and investor; Telegram seeks to redact investor internal email summarizing information from Telegram regarding past and anticipated expenditures including on TON blockchain on ground release of future business plans could hurt business, but Telegram's future business plans are directly relevant to key issues to be decided by Court including whether Telegram will continue to engage in efforts to support and develop the TON Blockchain and this business idea is not likely to harm Telegram's competitive standing; Agree to redact investor identifying information	As detailed in the letter, redactions to the Defendants' expenditures are proper. In addition, the statements only relate to the expenditure of funds after litigation commenced, so they are not relevant to the investors' reasons for entering into the Purchase Agreements or to the ultimate questions to be resolved in this litigation. Defendants reiterate the request that this document be filed under seal and filed on the public docket in redacted form.
Exhibit 4 to the Malloy Declaration	94-4 167-4	B	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-4 Object; Telegram seeks to redact references to how they spent the money raised in the Offering; Telegram's efforts to develop the Ton Blockchain are highly relevant to <i>Howey</i> test	As detailed in the letter, this document falls into Category B because it includes confidential business information related the company's expenditures. Defendants reiterate the request that this document be filed under seal and filed on the public docket in redacted form.

Document	ECF No. ¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions ²	Defendants' Reply
Defendants' Response to Plaintiff's 56.1 Statement	95 171-5	B	To the extent the Court grants Defendants' requests to seal, Defendants request this document be filed under seal and be placed on the public docket with redactions conforming to any related documents.	Object to redaction from this document of any information whose redaction in other documents the SEC has objected to	Defendants will re-file the Defendant's Response to Plaintiff's 56.1 Statement with revised redactions, if necessary, upon the Court's ruling on the third parties' sealing motions.
Defendants' Response to Plaintiff's 56.1 Counter-Statement of Undisputed Material Facts in Further Support of its Motion for Summary Judgment	120 171-6	B	To the extent the Court grants Defendants' requests to seal, Defendants request this document be filed under seal and be placed on the public docket with redactions conforming to any related documents.	Object to redaction from this document of any information whose redaction in other documents the SEC has objected to	Defendants will re-file the Defendant's Response to Plaintiff's 56.1 Counter-Statement with revised redactions, if necessary, upon the Court's ruling on the third parties' sealing motions.

Document	ECF No. ¹	Cat.	Request	SEC Position on Telegram's Proposed Redactions ²	Defendants' Reply
Category C - Banking Records					
PX 115	164-5	A, C	Defendants request this document be filed under seal in its entirety.	Dkt. 164-5 —two page wire transfer Object to sealing entire document, which contains evidence of payment by Telegram to entity involved in marketing and reselling gram interests; Agree to redacting confidential banking information	Category A: As detailed in the letter, this document also belongs in Category A because it references a third party investor. Further, Defendants disagree with the SEC's proposed redactions. Category C: Defendants maintain this document should be filed under seal in its entirety. In the alternative, Defendants are refiling this document with proposed redactions.